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OFFICE OF THE
EXECUTIVE SECRETARY

February 10, 1998

VIA Hand Delivery

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37238

IN RE: BellSouth Telecommunications, Inc.'s Entry Into Long Distance
(InterLATA) Service in Tennessee Pursuant to Section 271 of the
Telecommunications Act of 1996.
Docket No. 97-00309

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of NEXTLINK's First Set of Data
Requests to BellSouth Telecommunications, Inc., in the above captioned
proceeding.

Copies are being served on parties of record.

Sincerely,



Dana Shaffer
Directory, Legal and Regulatory Affairs

ds/jr

Enclosure

Regional Office

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CERTIFICATE OF SERVICE

I hereby certify that on February 10, 1998, a copy of the foregoing document was served on the parties of record, via hand delivery or Unites States mail, postage pre-paid, addressed as follows:

H. LaDon Baltimore, Esquire
Farrar & Bates
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Nashville, TN 37219-1823

Charles B. Welch, Esquire
Farris, Mathews, et al.
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Nashville, TN 37219

Henry Walker, Esquire
Boult, Cummings, et al.
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Dana Shaffer

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

REC'D TN
REGULATORY AUTH.

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BellSouth Telecommunications, Inc.'s Entry)
into Long Distance (interLATA) Service in)
Tennessee Pursuant to Section 271 of the)
Telecommunications Act of 1996)

Docket No. 97-00309 OF THE
EXECUTIVE SECRETARY

**NEXTLINK'S FIRST SET OF DATA REQUESTS TO
BELLSOUTH TELECOMMUNICATIONS, INC.**

NEXTLINK of Tennessee, LLC ("NEXTLINK") hereby serves its First Set of Data Requests to BellSouth Telecommunications, Inc. ("BellSouth"), to be answered in writing under oath.

DEFINITIONS

"BellSouth" means BellSouth Telecommunications, Inc., and its parents, subsidiaries, and affiliates, including, but not limited to, BellSouth Corporation and BellSouth Long Distance, Inc., their present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of BellSouth Telecommunications, Inc.

The term "document" means every writing or record of every type and description that is (or was formerly) in the possession, custody or control of BellSouth, including, but not limited to, correspondence, memoranda, workpapers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts,

including, but not limited to, electronic mail files and any other information-carrying media; and copies of such writing or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, memoranda, correspondence, schedules, progress schedules, time logs, drawings, computer disks, charts, projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices on any media whatsoever, including, without limitation, paper, film, any form of electronic, computerized, digitized, or magnetic storage, and all other methods for the expression or retention of information.

The term "communication" means any oral, graphic, demonstrative, telephonic, verbal, electronic, written or other conveyance of information, including but not limited to conversations, correspondence, memoranda, facsimile and electronic mail.

The terms "referring to" or "relating to" mean consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

INSTRUCTIONS

If BellSouth contends that any response to any data request may be withheld under the attorney-client privilege, the attorney work product doctrine, or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit a determination of the propriety of that claim:

the privilege asserted and its basis;
the nature of the information withheld;
the date, title, number of pages, and subject matter of any document that is withheld as privileged (except to the extent that you claim that such information itself is privileged);
the identity of the author(s) and/or preparer(s) and the addressee(s) (if any) of any document withheld as privileged.

If BellSouth contends that the response to any data request may be withheld on the grounds that it includes customer account records, or that such response constitutes proprietary confidential business information, please mask any customer-specific information that would enable NEXTLINK to identify particular customers (other than NEXTLINK) and identify with specificity the type of information so masked and the reasons for withholding such information.

These data requests are to be answered with reference to all information in BellSouth's possession, custody or control or reasonably available to BellSouth. These data requests are intended to include requests for information which is physically within BellSouth's possession, custody or control as well as the possession, custody or control of BellSouth's agents, attorneys, or other third parties from which such documents may be obtained.

If any data request cannot be responded to in full, answer to the extent possible and specify the reasons for BellSouth's inability to respond fully. If BellSouth objects to any part of a data request, answer all parts of the data request to which BellSouth does not object, and as to each part to which BellSouth does object, separately set forth the specific basis for the objection.

These data requests are continuing in nature and require supplemental responses should information unknown to BellSouth at the time BellSouth serves its responses to these data requests subsequently become known.

DATA REQUESTS

- 1) Please produce all documents, including all internal analyses and all correspondence, internal memoranda, telephone records, electronic mail, facsimiles, and other records of communications between BellSouth and NEXTLINK or within BellSouth that refer to outages on NEXTLINK's network.

Please produce all documents, including all internal analyses and all correspondence, internal memoranda, telephone records, electronic mail, facsimiles, and other records of communications between BellSouth and NEXTLINK or within BellSouth that refer to blockage of calls to or from NEXTLINK customers.

2) Please produce all documents, including all internal analyses and all correspondence, internal memoranda, telephone records, electronic mail, facsimiles, and other records of communications between BellSouth and NEXTLINK or within BellSouth that refer to problems, difficulties, or delays of any kind in the transfer of any customer from BellSouth to NEXTLINK.

3) Please produce all documents, including all internal analyses and all correspondence, internal memoranda, telephone records, electronic mail, facsimiles, and other records of communications between BellSouth and NEXTLINK or within BellSouth that refer to problems, difficulties or delays of any kind in the provisioning of unbundled loops to NEXTLINK or provisioning appointments missed by BellSouth.

4) Please produce all documents, including all internal analyses and all correspondence, internal memoranda, telephone records, electronic mail, facsimiles, and other records of communications between BellSouth and

NEXTLINK or within BellSouth that refer to attempts by NEXTLINK to obtain access to BellSouth's CNAM database.

5) Please produce all documents, including all internal analyses and all correspondence, internal memoranda, telephone records, electronic mail, facsimiles, and other records of communications between BellSouth and NEXTLINK or within BellSouth that refer to complaints by NEXTLINK regarding BellSouth's failure to provide white pages listings for NEXTLINK customers in a timely manner.

6) Please produce all documents, including all internal analyses and all correspondence, internal memoranda, telephone records, electronic mail, facsimiles, and other records of communications between BellSouth and NEXTLINK or within BellSouth that refer to complaints by NEXTLINK regarding BellSouth's failure to produce accurate bills.

7) Please produce all documents, including all internal analyses and all correspondence, internal memoranda, telephone records, electronic mail, facsimiles, and other records of communications between BellSouth and NEXTLINK or within BellSouth that refer to complaints by NEXTLINK regarding difficulties in obtaining digital signature verification for access to BellSouth's LENS system.

- 8) Please produce all documents that refer to applications by NEXTLINK for physical collocation in BellSouth central offices.
- 9) Please produce any survey or other analysis conducted by BellSouth regarding the availability of collocation space in its central offices and/or at its remote switches.
- 10) William M. Stacy, Assistant Viced President-Services for Interconnection Operations, claims in paragraph 85 of his January 15, 1998 draft FCC affidavit that service jeopardies are unlikely to occur on most CLEC orders because most of those orders will switch a customer's existing service to a CLEC. Does BellSouth contend that service jeopardies are unlikely to occur on orders for unbundled loops?
- 11) Has BellSouth collected data regarding the percentage of orders for unbundled loops in Tennessee that have had a service jeopardy? If so, please provide that data.
- 12) Has BellSouth collected data regarding the percentage of orders for unbundled loops in Tennessee for which BellSouth has missed a provisioning appointment without advising its CLEC customer? If so, please provide that data.

13) In paragraph 87 of Mr. Stacy's affidavit, Mr. Stacy claims that CLECs are provided with service jeopardy notification in substantially the same time and manner as BellSouth's retail operation. Please provide all documentation supporting this statement, including any performance measurements maintained by BellSouth regarding service jeopardy notifications provided to its retail customers and to CLECs.

14) In paragraph 81 of Mr. Stacy's affidavit, BellSouth contends that errors in orders can be corrected by the CLECs. Does BellSouth have a policy of correcting orders submitted by CLECs? If such a policy exists, please produce all documentation setting forth the policy.

15) Paragraph 13 of the draft affidavit of Keith Milner, Director-Interconnection Operations, states that BellSouth as of November 30, 1997 had provisioned approximately 5,918 trunks interconnecting its network with the networks of CLECs in Tennessee. How many of those trunks have been provisioned to interconnect BellSouth's network with NEXTLINK's network?

16) Paragraph 16 of Mr. Milner's affidavit states that BellSouth has, in the past, experienced a small number of isolated problems in establishing physical connections with certain CLEC networks. Please state whether any of these problems outlined by Mr. Milner in his affidavit occurred in establishing physical

connections with NEXTLINK's network. For each such problem, please describe the problem in detail, including the date on which the problem began, the cause of the problem, the manner of resolution of the problem, and the date on which the problem was resolved.

17) Does BellSouth contend that its space rental charge for physical collocation is cost-based?

18) Please produce all documents reviewed, considered or relied upon by BellSouth in determining its recurring rate for the lease of physical collocation space. This should include all appraisals, expert opinions, market surveys, property records, and other documents collected by BellSouth or anyone working on its behalf that establish the value of space in BellSouth's central offices or other comparable commercial real estate.

19) Does BellSouth contend that its charge for power to physically collocated equipment is cost-based? Please produce all documents reviewed, considered, or relied upon by BellSouth in determining its recurring rate for power to physically collocated equipment.

20) Is the rate referenced in No. 19 charged only for power actually used by the collocator, or for the potential capacity of the collocator's equipment as

installed? Please explain how this charge is assessed, and how a collocater's power usage is measured.

21) Does BellSouth contend that its charges for construction and/or space preparation of physical collocation space are cost based? Please produce all documents reviewed, considered, or relied upon by BellSouth in determining its nonrecurring rates for construction and/or space preparation of physical collocation space for physical collocation arrangements in Tennessee.

22) Paragraph 42 of the affidavit of Mr. Milner states that CLECs in Tennessee had 3,823 unbundled loops in service from BellSouth as of November 30, 1997. How many of these loops were provisioned by BellSouth to NEXTLINK?

23) In paragraph 46 of Mr. Milner's affidavit, Mr. Milner states that BellSouth conducted a study of its cutover results for one CLEC doing business in Georgia. Has BellSouth conducted any other such studies? If so, please produce all documentation relating to the studies, including explanations of the methodology used, the information collected, and the studies' results.

24) In paragraphs 47 through 51 of Mr. Milner's affidavit, Mr. Milner describes what he terms "a few problems" that have occurred in provisioning unbundled loops. Does BellSouth contend that these are the only problems that CLECs

have experienced in obtaining unbundled loops from BellSouth? If BellSouth's response to this data request is no, please describe all other problems of which BellSouth is aware that have occurred in provisioning unbundled loops.

25) Please produce all documents referring problems that BellSouth has experienced in provisioning unbundled loops to NEXTLINK, as well as actions taken by BellSouth to correct such problems. The requested documents include, but are not limited to, cutover status reports, correspondence, memoranda or other records of communication between BellSouth and NEXTLINK, and any documents produced during any root cause analysis of the problems BellSouth has experienced in provisioning loops to NEXTLINK.

26) In paragraph 48 of Mr. Milner's affidavit, Mr. Milner describes transmission loss in circuits sold in Georgia. Does BellSouth deny that NEXTLINK has experienced transmission loss in circuits provided by BellSouth to NEXTLINK in Tennessee?

27) Please produce all documents referring to any transmission loss or degradation experienced in unbundled loops provisioned by BellSouth to NEXTLINK, as well as actions taken by BellSouth to correct such problems. The requested documents include, but are not limited to, status reports, correspondence, memoranda or other records of communication between

BellSouth and NEXTLINK, and any documents produced during any root cause analysis of the transmission loss.

28) In paragraph 49 of Mr. Milner's affidavit, Mr. Milner contends that customer service was interrupted during the process of loop conversion by BellSouth to a CLEC in a very few instances early in 1997. Does BellSouth deny that NEXTLINK has experienced interruptions in service to customers caused by problems with BellSouth in coordination of loop conversions?

29) Please produce all documents referring to service interruptions that have occurred in unbundled loops provisioned by BellSouth to NEXTLINK, as well as actions taken by BellSouth to correct such problems. The requested documents include, but are not limited to, status reports, correspondence, memoranda or other records of communication between BellSouth and NEXTLINK, and any documents produced during any root cause analysis of the problems BellSouth has experienced in provisioning loops to NEXTLINK.

30) Paragraph 77 of Mr. Milner's affidavit identifies only one problem associated with the inclusion of CLEC listings in BellSouth's white page listings. Does BellSouth contend that it has properly included all NEXTLINK customers in the Greater Nashville directory issued on January 14, 1998?

- 31) Mr. Milner claims in paragraph 92 of his affidavit that BellSouth will provide requesting CLECs with nondiscriminatory access to databases such as the calling name delivery service database. Does BellSouth contend that it has provided such nondiscriminatory access to NEXTLINK?
- 32) What percentage of loops in Tennessee are now serviced using integrated digital loop carrier?
- 33) Is BellSouth increasing the percentage of loops in Tennessee that are serviced by integrated digital loop carrier?
- 34) What percentage of loop facilities does BellSouth project it will provision using integrated digital loop carrier in the year 2000 in Tennessee?
- 35) What percentage of loops in Tennessee are presently provisioned from remote switches?
- 36) Is BellSouth increasing the percentage of loops that are provisioned from remote switching units?
- 37) What percentage of loops does BellSouth project will be provisioned from remote switches in the year 2000?

38) Does BellSouth charge special construction fees to CLECs for facilities construction associated with the provisioning of unbundled loops in Tennessee? If so, under what circumstances? Are these special construction fees accounted for in BellSouth's unbundled loop cost studies on file with the Tennessee Regulatory Authority? Is so, how?

DATED this 10th day of February, 1998.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'D. Shaffer', written over a horizontal line.

Dana Shaffer
105 Molloy Street, Suite 300
Nashville, TN 37201
615-777-7700

Attorney for NEXTLINK Tennessee